

*REMARKS*

In response to the Official Action mailed February 4, 2004, Applicants amend their application and request reconsideration. In this Amendment, claims 20, 28, and 33 are canceled and claims 37-40 are added, so that claims 19, 22-27, 31, 32, and 35-40 are now pending. No new matter has been added.

Claims 19, 24, and 32 are amended for clarity. Amended claims 19, 24, and 32 now make clear that that a first correlation between a network address and a call reference value for a request is stored in a table, and that first correlation stored in the table is used to generate a second correlation between the network address and a virtual circuit identifier, the second correlation also being stored in the table. Amended claims 19 and 32 further clarify that the call reference value is inserted into the request message, and is returned in the virtual circuit response. Claim 25 is amended for conformity with amended claim 24. Claims 37-40 are added to recite additional features of the invention, namely the interaction between the host computer and the virtual circuit interface device.

An interview was held on March 31, 2004 between Applicants' attorney and Examiners Molinari and Hsu. During that interview, the references cited by the Official were discussed in relation to claims 19, 24, and 32. No agreement was reached.

The Official Action objected to claim 19 for containing a repeated "the" in line 16. That informality is corrected in this Amendment.

The Official Action rejected claims 20 and 24 under 35 U.S.C. 112, second paragraph. The rejection of claim 20 is moot in view of its cancellation. Regarding claim 24, the Official Action notes that the final line recites "the association" where antecedent basis exists only for "the first association" and "the second association." Accordingly, the final line of claim 24 is amended to include the word "second." References to "association" have been replaced with "correlation."

The Official Action rejected claims 19, 20, 22-28, 31-33, 35, and 36 as unpatentable over Burwell et al. (US Patent 5,818,842, hereinafter Burwell) in view of McDysan et al. ("ATM Theory and Applications," hereinafter McDysan). That rejection is moot in view of the amendments to the pending claims.

Regarding claims 19, 24, and 32, the Official Action relied on Burwell to teach receiving a request and setting up an ATM circuit. The Official Action acknowledged that Burwell does not teach the details of call setup in an ATM network. However, McDysan also fails to teach the details of ATM call setup as recited by the amended claims. The present invention relates a host computer and a method therefor that operates to establish virtual circuit connections for clients on a

local area network. McDysan, however, merely relates to the signaling between two computers in establishing a virtual circuit connection. McDysan does at all suggest a host computer that establishes a mapping between local area network addresses and virtual circuit connections as recited by the claims.

McDysan does not teach storing a correlation between a call reference value of a request and the network address of the requestor as an entry in a table. McDysan merely discloses user network interface (UNI) signaling messages (see page 405 of McDysan). Though a call reference is disclosed, McDysan only teaches that the call reference is included in a signaling message that may also include a call party number (see Table 15.3 of McDysan). McDysan does not teach or suggest a correlation, i.e., a reciprocal relationship between the call reference and the call party number, nor does McDysan teach storing such a relationship in a table.

Furthermore, McDysan fails to teach using the first correlation to generate a second correlation between the virtual circuit identifier and the network address of the requestor. Again, McDysan only teaches that a network address may be included in a signaling message that may also include a virtual circuit identification (see Table 15.3 of McDysan). McDysan does not teach or suggest a correlation, i.e., a reciprocal relationship between the network address and the virtual circuit identification, nor does McDysan teach storing such a relationship in a table. Moreover, even if McDysan taught the first and second correlations, it does not suggest generating the second correlation using the first correlation.

Regarding amended claim 24 specifically, McDysan fails to teach a packet switching program passing data based on the second correlation. In fact, McDysan does not disclose any kind of program at all. Again, McDysan merely discloses UNI message signaling – no mention is made of packet switching (see page 405 of McDysan).


The combination of Burwell and McDysan fails to teach or suggest all of the claim limitations of claims 19, 24, and 32. Accordingly, *prima facie* obviousness has not been established, and the rejection of claims 19, 24, 32, and their dependent claims should be withdrawn.

Furthermore, new claims 37-40 are in a form for allowance, since the prior art does not disclose a method for a host computer to act as a proxy between local area network devices and a virtual circuit interface device.

In re Appln. of JEFFREY et al.  
Application No. 09/459,670

Reconsideration and allowance of the pending claims are earnestly solicited.

Respectfully submitted,



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Amendment or ROA - Regular (Revised 9/03/03)